

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Myori Granger

Write the full name of each plaintiff.

CV
(Include case number if one has been assigned)

-against-

Tyrone A. Blackburn

COMPLAINT

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED
SDNY PRO SE OFFICE
2024 JUN 18 PM 3:25

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Myori Granger, is a citizen of the State of
(Plaintiff's name)

New Jersey
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Tyrone A. Blazekburn is a citizen of the State of
(Defendant's name)

New York

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Myori S Granger
First Name Middle Initial Last Name

182 N Arlington Ave
Street Address

East Orange NJ 07017
County, City State Zip Code

973-738-2212 PANAMANIANANSWTS1
Telephone Number Email Address (if available) @gmail.com

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Tyrone Blackburn
 First Name Last Name
Attorney / Kings County Attorney
 Current Job Title (or other identifying information)
1242 E 80th St 3rd Floor
 Current Work Address (or other address where defendant may be served)
Brooklyn NY 11236
 County, City State Zip Code

Defendant 2:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 3:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

9/14/24

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

please see Attached documents

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

- I am seeking monetary relief for [mental anguish] in the amount of \$10,000
- I wish for ~~defendant~~ defendant to no longer mention my name in false, malicious allegations.
- I wish for defendant to no longer contact me via any and all communications

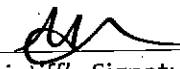
V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

6/17/24
Dated


Plaintiff's Signature

Myori S Granger
First Name Middle Initial Last Name

182 N Arlington Ave
Street Address

East Orange NJ 07017
County, City State Zip Code

973-738-2212
Telephone Number

PANAMIANSWT91@gmail.com
Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Statement

06/17/24

I Myori Granger file this complaint against attorney Tyrone A Blackburn, for Harassment and Defamation.

I have also attached supportive photos for proof of his psychotic break. Blackburn and I have never met in person yet in the following images you will see how salacious and malicious he behaved unprovoked. Referring to me as a "bitch" numerous times, making false claims on my genitalia, subliminally making a death threat towards me and then apologizing for it all ONLY after finding out I was at the police station reporting him. I do not feel safe and he has made me feel in danger.

-Please also take note that Alysohn (Aly) is my best friend also his ex fiancée.

[Statement of Facts]

Attorney Tyrone A. Blackburn has had yet another psychotic break. This time attacking me verbally unprovoked. Sending me threatening and demeaning text messages due to his infidelity towards his now ex fiancée (my bestfriend). I had to report him to the police out of fear for my safety after he threatened me. I do not feel safe nor at peace knowing he is around causing chaos with false fabricated salacious allegations.

Tyrone and I have never met in person, yet according to his ex fiancée he sought spiritual information about me from an "African Shaman" in Brooklyn, NY. Tyrone is clearly mentally unstable and threatening.

The only interactions he and I had were last year 2023 when he was supposed to represent me in a work related case; however, that did not push through due to the fact he and my friend broke up during that time and he could not remain professional. So I had decided on May 30th 2023 to let him know I would be seeking another legal attorney that could better assist me. (Please see attached photos)

Also, stated by my friend Aly, he had illegally gained access to her locations, personal emails and text messages, spying on the private conversations she and I were having. His behavior has shown to be extremely inappropriate, obnoxious and overly obsessive on all accounts and I am fearful for my safety.

Please see attached all documents of previous contracts and communications from April-May 2023 and current photos of the threatening messages sent to me from Blackburn as of 4/14/2023

-Note Tyrone Blackburn claims in the last text message that his cousin took hold of his phone; however, Tyrone has a history of portraying this salacious behavior. As shown in attached, Judge Denise L. Cote has also reported Tyrone to the Grievance Committee in regards to his "malpractice" for the exact behavior he has too shown towards me. To also add that in the event he claims to not have sent that very long message, he still admits to having said false, salacious information about me to a third party!

- I have also reported Tyrone to the Committee.

**EAST ORANGE POLICE DEPARTMENT
INVESTIGATION REPORT**

1. Agency Name EAST ORANGE POLICE DEPARTMENT		2. Muni. Code 0706	3. Phone Number 973-266-5000	4. CAD Incident# 2024-0035814	5. Other Agency Case #	6. Department Case Number 24-0035848
7. Date/Time 04/17/2024 22:17		8. NJS 2657		9. Victim Name GRANGER, MYORI SHAWNEE		10. SSN
11. Age 30		12. DOB 10/17/1993		13. Sex FEMALE	14. Race B/AF-AMER	15. Eth NON HISPANIC
16. Between <input checked="" type="checkbox"/>		17. Hour 22:17	18. Day SUN	19. Mo. 04	20. Date 14	21. Yr. 2024
22. Victim(s) Home Address 122 SAW MILL ROAD, LONG POND, PA 18334		23. Home Phone / Cellular / 973-738-2212		24. Crime/Incident Location 182 N ARLINGTON AVE, APT 29, EAST ORANGE CITY, NJ 07017		
25. Victim's Employer		26. Phone #		27. Municipality EAST ORANGE CITY		
28. County ESSEX		29. Code 0706		30. Person Reporting Crime/Incident GRANGER, MYORI SHAWNEE		
31. Date and Time 04/14/2024 22:17		32. Type of Premises RESIDENCE / HOUSE		33. Weapons / Tools Other Action		
34. Address 122 SAW MILL ROAD, LONG POND, PA 18334		35. Home Phone / Cellular / 973-738-2212		36. Modus Operandi victim stated her best friend flancé harassed her.		
37. Vehicle		38. Year		39. Make	40. Model	41. Body Type
42. Color		43. Registered Number & State		44. Serial Number or Identification		45. Towing Company
46. Value of Stolen/Recovered Property		47. Currency		48. Jewelry	49. Furs	50. Clothing
51. Auto		52. Total Value Stolen		53. Total Value Recovered		54. Technician-Agency
55. Technical Services		56. Teletype Alarm		57. Weather CLEAR		58. NIC
59. Assisting Agencies		60. No. of Accused 0		61. Adult 0	62. Juvenile 0	63. Status Crime Closed
64. Status Case Closed		65. UCR Status Month: Yr.		66. Date Cleared		67. Code
68. Name [OTHER] BLACKBURN, TYRONE A		69. Address - 1242 E 80TH STREET, 3RD FL, BROOKLYN, NY 11236		70. Age 39		71. Sex M
72. Race B		73. Eth N		74. DOB 11/20/1984		75. HM
76. WK		77. C		78. Narrative		

On 04/17/2024 at approximately 2217 hours, this undersigned officer along with Officer M. Huerta responded to 15 South Munn Avenue (Headquarters) for a harassment complaint. Upon arrival, we met with Ms. Myori Granger who stated she was harassed by her best friend's boyfriend.

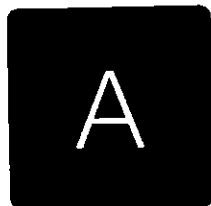
According to Ms. Granger, on this date, she received a text message from Mr. Tyrone Blackburn where he called her a "bitch" numerous times, texted her, "I hope your mother has a life insurance policy because you are worth more dead than alive", and made various statements to her that she claimed were false. Ms. Granger stated Mr. Blackburn does not know where she lives however, stated she is in fear of her safety because she does not know what Mr. Blackburn is capable of.

The victim advised these officers she believes that these harassing text messages stemmed from Mr. Blackburn believing she was the reason for him and her best friends' recent breakup. The victim also stated Mr. Blackburn is a lawyer who practices out of New York and New Jersey, mutually knows him through her best friend, and has represented her as her counsel in a lawsuit. She went on to state she has never met or seen Mr. Blackburn and has only communicated with him in the past regarding her case with her former employer.

Officer Huerta showed me a text message sent by Mr. Blackburn where he called her a "bitch" multiple times, accused her of having sex with multiple people, and having venereal diseases. The victim stated those statements were not true.

Officer Huerta and Sergeant Ortiz were advised. The victim was advised.

Officer No.	Page No.	Report Date	Reviewed By:
28	102	05/02/2024	SERGEANT KIMBERLY FERRELL
Supervisor Signature			<i>[Signature]</i>



AD2-GRV2

AD2-GRV2@nycourts.gov

Hide details



2

To:



mimi

Date: April 15, 2024, 10:52 AM

This will confirm receipt of your email.

***Grievance Committee for the 2nd, 11th & 13th
Judicial Districts***

335 Adams Street, Suite 2400

Brooklyn, New York 11201

(718) 923-6300

nycourts.gov/courts/ad2

PLEASE NOTE: Pursuant to Judiciary Law Section 90(10), the

THIS IS A CONFIDENTIAL

1:23

5G+ 91

32



+1 (347) 342-7432

Mon, Apr 15, 10:19 PM

I was not planning on ever speaking to you, but I must share that you are a trifling dirty bitch. As soon as I saw your photo I knew what you were into. But best believe what's done in the dark always comes to light. Allison is extremely naive. She does not have the proper protection and safeguards to defend against what you, your grandmother and whomever else you go to are doing.

Your life is shit. Your life will continue to be shit. You will never find true happiness. You will get old, you will be lonely, and

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32



+1 (347) 342-7432

old, you will be lonely, and you will be broke. You got Ally to spend nearly \$200k on a fucking apartment she didn't live in. You had your drug dealing man steal her vehicle and do a drug run to Mexico, which I have reason to believe you were probably with him. He stripped and dumped her car and you knew it and said nothing for months. You are a worthless bitch, and I am referring this shit to the Feds.

You stole all of Ally's Chanel Bags, you stole her shoes and her clothes, and have the fucking nerve to wear her shit, FaceTime her and when she ask you about her shit that she

1:23

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32



+1 (347) 342-7432

about her shit that she sees you in you have the nerve to say you look better it in than she does. What a fucking joke. I told Ally not to have your fucking ass in my car or in the apartment. She does not listen. I told her you're fucking evil and she should not eat or drink from you. But Ally does not listen. I told her not to go to your fucking mothers house. She did not listen. Then you pop up at the dress fitting, you go to my friend Roses house and insult her with your stupidity, and classlessness, and within less than a month Ally's life is in shambles. You don't see that you are a fucking blight?!

1:23

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32



+1 (347) 342-7432

I hope your mother has a life insurance policy on you because you are worth more dead than alive. You contribute nothing to society but darkness.

No respectable man will ever marry. You are a pass around. You're just good to get fucked, to suck dick, and then to get dumped. That's it. You have no value. You are not smart, you have no skills, and the only thing you do ("modeling") you're not even the best in your business at it. You ain't shit.

You are a worthless soulless bitch, and I was praying for the day that I

7

1:23

5G+ 91

32



+1 (347) 342-7432

praying for the day that I
could say this to your
fucking face but evil
people like you are fucking
cowards. Your own family
don't want you around..
you don't have shame?!
You are fucking homeless.

You would never be able to
face me. I see right
through your bullshit. Your
own mother despises you.
That should tell you
something.

Not to mention your
fucking uterus ain't worth
a fucking damn with all of
the boils, and fucking
lesions you have in your
nasty ass pussy. You
fucked Chris Brown, then
he sees you a year later

1:23

5G+ 91

32



+1 (347) 342-7432

and forgot he even fucked you. Ain't that some shit. That's how lackluster and easily forgettable your pussy is.

Another reason could be that you have serious bacterial vaginosis, so it's no wonder you could never keep a fucking man because your pussy is too stink. You need to bend over, take some incense soaked in holy water, shove it up your rancid pussy light it and smoke out ya cunt.

Lastly, whatever you send this way will be returned 100 times over. I have more access, and more money than you. This ain't

9

1:23

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32



+1 (347) 342-7432

money than you. This ain't the war you want. I'm not one to be played with.

Mon, Apr 20 at 11:01 PM

Hey Myori,

I am very sorry for the previous message. I did not know that it was sent to you. My stupid cousin took my laptop and sent it to you. I would never send something like this.

Please accept my apology. Whatever Aly and I have going on has nothing to do with you. I was venting to my cousin and shared some things with her and she was upset. I did not know she sent that to you.

10

1:23

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+1 (347) 342-7432

Hey let me know if there is anything that you may need, or anything that I could do. I feel horrible that you had to read such vile language. I would never ever speak like that to a woman. That is not how I carry myself. You deserve better than that. The few interactions I had with you were pleasant. I never had any animosity towards you. Aly clearly loves you as her friend, and I love Aly, so naturally I have love for you as well.

Again, please accept my apology.

1:26

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32



+1 (347) 342-7432

Mon, May 20, 2024 11:03 AM

Hi Tye,

I hope you are well. I am sure Ally has already informed you, but I have decided to seek legal counsel here in California. I understand that you have many cases you have to take on and I just need clear constant communication with my attorney. I wish you the best on your future cases, and thank you so very much for your previous help.

Mon, Apr 14, 2024

Sun, Apr 14, 2024 12:26 PM

I was not planning on ever

12

9:10

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Myori Granger Re...

**T. A. BLACKBURN**TYRONE A.
BLACKBURNMEMBER OF
NY & NJ BARFEDERAL MEMBERSHIP
EDNY, SDNY, & DNJ
RETAINER AGREEMENTDear Myori Granger,
1242 EAST 80TH STREET,
3RD FLOOR

You have requested that ~~Tyrone A. Blackburn~~ ^{BROOKLYN, NY 11236}, Esq. and T. A. Blackburn Law, PLLC (the "Firm") represent you in connection with the legal matter against **SBE Entertainment Group** and any related entities, affiliates, subsidiaries, or individuals (collectively, the "Defendants"). This letter will outline the terms of your retention of the Firm.

We agree to represent you in discussions with the Defendants and negotiate a settlement on your behalf. If appropriate, we will file a claim with government agencies and prosecute those claims through the agencies.

We will take whatever action we deem appropriate, consistent with our knowledge of the law. After consultation with you, we will best represent your interests as you have described them. While we will use our most diligent efforts in representing you in this matter, we cannot and do not warrant or predict results nor the outcome.

1. Who will work on your case: I will be the attorney responsible for your matter. For efficiency purposes, I may delegate work to other lawyers or legal assistants. Before delegating work to any other attorneys, you will be notified. You would be required to approve the onboarding of any additional attorneys.

2. Legal Fees: In the event your claims are resolved by settlement between you and the Defendants outside of any court filings, you agree to pay the Firm as its fee for legal services rendered, an amount equal to thirty-three and a third percent (33.3%) of the gross aggregate monetary value obtained on your behalf in whatever form. If the case is filed in State or Federal court, and it is resolved through court-ordered mediation or through discussion between opposing counsel, you agree to pay the Firm as its fee for legal services rendered, an amount equal to forty percent (40%) of the gross aggregate monetary value obtained on your behalf in whatever form.

If your claims are filed in State or Federal Court, and you prevail at trial, we will request that the Court make the Defendants pay your legal fees. If

9:09

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13

chrome://external-file

1 of 4



Page 1 of 4

T. A. BLACKBURN LAW

TYRONE A. BLACKBURN

MEMBER OF
NY & NJ BARFEDERAL MEMBERSHIP
EDNY, NDNY, SDNY & DNJ1242 East 80th Street, 3rd Floor
Brooklyn, New York 11236

April 6, 2023

Sent via certified mail:Sam Nazarian
SBE Entertainment Group
2535 Las Vegas Blvd S
Los Angeles, CA, 90036**Re: Myori Granger Employment Matter**

Dear Mr. Nazarian,

My firm has been retained by Myori Granger ("Ms. Granger") regarding her employment with SBE Entertainment Group ("Respondent"). The Respondent hired Ms. Granger on or about June 1, 2022. Ms. Granger's most recent title is VIP Host. On or about March 16, 2023, Ms. Granger was physically and verbally assaulted by Romy Farhadi ("Farhadi")— General Manager at Hyde Sunset. Ms. Granger escalated these incidents to the following managers: JC Ayon-Torres, and Heather Ward. They **FAILED** to address the matter appropriately. In fact, on April 5, 2023, in a direct act of retaliation and a clear violation of California employment law, the Respondent made the foolhardy decision to write Ms. Granger up for "insubordination."

The respondents' actions clearly violate California's Fair Employment and Housing Act (FEHA). A prima facie case of retaliation in violation of FEHA requires Plaintiff to show (1) that she engaged in protected activity; (2) Defendant subjected her to an adverse employment action; and (3) a causal link between the protected activity and the adverse action. (*Yanowitz v. L'Oreal USA, Inc.* (2005) 36 Cal.4th 1028, 1042.). *Muniz v. Sutter Valley Hosps.*, 2019 Cal. Super. LEXIS 53384, *17. Here, Ms. Granger filed a complaint of assault by Farhadi. Within less than a month, Respondent wrote Ms. Granger up and accused her of insubordination regarding the assault. The temper of proximity between the assault, Ms. Granger's complaint of the assault, and the Respondent's disciplinary action against Ms. Granger are so close that it removes all doubt of retaliatory intent.

In furtherance of their act of retaliation, on April 6, 2023, Ms. Granger was removed from the company email platform and isolated from her colleagues via Microsoft Teams. An employee's formal or informal complaints to a supervisor regarding unlawful discrimination is a "protected activity," and actions taken against the employee after such complaints may constitute retaliation.

☎ 347-342-7432 ✉ tblackburn@tablackburnlaw.com 🌐 TABlackburnlaw.com



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14

Lawyer Behind Diddy Sexual Abuse Case Criticized by Judge Over Pattern of 'Salacious' Case Filings

A judge says Tyrone Blackburn — lead counsel in a high-profile case against Sean Combs — aimed to "embarrass defendants" with "salacious allegations."



A An attorney who filed one of the several sexual abuse lawsuits against **Sean “Diddy” Combs** is now facing potential discipline himself after a federal judge in another case sharply criticized him for filing suits designed to “garner media attention” and “embarrass defendants.”

In an order issued Wednesday (April 3) in a separate lawsuit, Judge **Denise Cote** referred **Tyrone Blackburn** to the grievance committee for New York’s federal court district – an entity that decides whether attorneys have violated court rules. She cited his conduct in five different lawsuits, saying Blackburn’s filings in those cases had featured “glaring deficiencies.”

3 “A reasonable inference from

^{these} ~~Blackburn's pattern of behavior~~ is that

he improperly files cases in federal court to garner media attention, embarrass defendants with salacious allegations, and pressure defendants to settle quickly,” Judge Cote wrote.

“Indeed, his submissions to this court have been rife with disturbing allegations against the defendants and defense counsel.”